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*Attorneys for Plaintiffs REMARK  
HOLDINGS, INC. and KANKAN LIMITED*

China Branding Group Ltd. (in Official  
Liquidation)  
c/o Grant Thornton Specialist Services  
(Cayman) Ltd  
10 Market Street #765, Camana Bay,  
Grand Cayman

Joint Official Liquidators, Hugh Dickson,  
Grant Thornton Specialist Services (Cayman)  
Limited  
10 Market Street No. 765  
Camana Bay, Grand Cayman KY1 9006  
Cayman Islands  
-and-  
David Bennett  
Grant Thornton Recovery and  
Reorganisation Limited  
12th Floor, 28 Hennessy Road  
Wanchai  
Hong Kong SAR  
+852 3987 1200  
*Pro Se Defendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REMARK HOLDINGS, INC., et al.,

*Plaintiffs,*

v.

CHINA BRANDING GROUP LIMITED (IN OFFICIAL  
LIQUIDATION), et al.,

*Defendants.*

Case No. 2:18-cv-00322

**STIPULATION FOR FURTHER  
EXTENSION OF TIME FOR  
CAYMAN DEFENDANTS TO  
RESPOND TO COMPLAINT  
(THIRD REQUEST)**

Pursuant to Fed. R. Civ. P. 12(a)(1) and LR IA 6-1, Remark Holdings, Inc.; Kankan Limited;  
China Branding Group Limited (In Official Liquidation), an exempted Cayman Islands company  
acting by and through its joint official liquidators ("CBG"); and the Joint Official Liquidators, with  
no personal liability, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David  
Bennett of Grant Thornton Recovery and Reorganisation Ltd (the "JOLs," and together with CBG,  
the "Cayman Defendants") hereby stipulate to the further extension of the Cayman Defendants' time

1 to respond to the Complaint to August 31, 2018. In support of this stipulation, the undersigned  
2 parties state as follows:

3 1. On May 10, 2018, the Bailiff of the Grand Court of the Cayman Islands (the “Grand  
4 Court”) attempted to effect service of the Summons and Complaint on each of the Cayman  
5 Defendants, as demonstrated by the Affidavits of Service dated May 11, 2018 [ECF Nos. 27–29],  
6 and their time to respond to the Complaint was originally May 31, 2018, which time was extended  
7 to June 29, 2018 [see ECF No. 33].

8 2. CBG does not contest service of the Summons and Complaint. The JOLs do not  
9 believe that service of the Summons and Complaint has properly been made upon them. However,  
10 the JOLs are voluntarily electing to waive service of the Summons and Complaint.

11 3. Pursuant to Section 110(2) of the Companies Law (2018 Revision) of the Cayman  
12 Islands, “The official liquidator may – (a) with the sanction of the Court, exercise any of the powers  
13 specified in Part I of Schedule 3 ...” [*Emphasis added*]. That Schedule states “SCHEDULE 3, Powers  
14 of Liquidators, Part I, Powers exercisable with sanction, 1. Power to bring or defend any action or  
15 other legal proceeding in the name and on behalf of the company.”

16 4. Accordingly, the Cayman Defendants are obliged to seek approval from the  
17 Liquidation Committee of CBG, following which the Cayman Defendants must apply to the Grand  
18 Court for permission to defend this proceeding and retain U.S. counsel. That process was commenced  
19 prior to the undersigned parties’ second request for an extension of time to respond to the Complaint  
20 [see ECF No. 34], but requires Cayman Defendants to enter into a “funding agreement” in order to  
21 retain counsel for their defense, which the Cayman Defendant expect to execute shortly. The Cayman  
22 Defendants must also apply to the Grand Court for approval of this funding agreement. Accordingly,  
23 the Cayman Defendants have requested a third extension of their time to respond to the Complaint  
24 in order to obtain those approvals.

25 5. This is the undersigned parties’ third request for an extension. The first request was  
26 submitted on June 11, 2018, and was approved by the Honorable Magistrate Judge Carl W. Hoffman  
27 on June 22, 2018. [ECF No. 33]. The second request was submitted on June 28, 2018, and was  
28 approved by the Honorable Magistrate Judge Carl W. Hoffman on July 2, 2018. [ECF No. 35].

1           6.       The undersigned parties stipulate and agree that Plaintiffs' consent to the Cayman  
2 Defendants' extension requests is subject to the Cayman Defendants' agreement to not assert or  
3 otherwise raise any defense to liability, damages or remedies arising from or related to Plaintiffs'  
4 alleged failure to prosecute this action during such extension periods.

5  
6 DATED: August 1, 2018

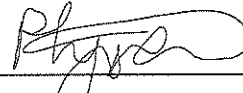
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17 *Attorneys for Plaintiffs REMARK*  
18 *HOLDINGS, INC. and KANKAN LIMITED*

Phillip Tyrrell

19 

for and on behalf of the

20 JOINT OFFICIAL LIQUIDATORS, with no  
21 personal liability, HUGH DICKSON OF  
22 GRANT THORNTON SPECIALIST  
23 SERVICES (CAYMAN) LTD, and DAVID  
24 BENNETT OF GRANT THORNTON  
25 RECOVERY AND REORGANISATION  
26 LTD  
27 *for and on behalf of*  
28 CHINA BRANDING GROUP LIMITED  
(IN OFFICIAL LIQUIDATION)

*Pro se Defendants*

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 REMARK HOLDINGS, INC., et al.,

4 *Plaintiffs,*

5  
6 v.

7 CHINA BRANDING GROUP LIMITED (IN OFFICIAL  
8 LIQUIDATION), et al.,

9 *Defendants.*

Case No. 2:18-cv-00322

**ORDER ON STIPULATION FOR  
FURTHER EXTENSION OF TIME  
FOR CAYMAN DEFENDANTS TO  
RESPOND TO COMPLAINT  
(SECOND REQUEST)**

11 The Court, having considered the above stipulation of the parties, and good cause appearing,  
12 finds as follows:

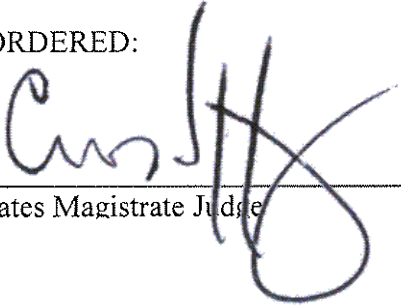
13 1. Defendant China Branding Group Limited (In Official Liquidation), an exempted  
14 Cayman Islands company acting by and through its joint official liquidators, with no personal liability  
15 ("CBG") was validly served with the Summons and Complaint on May 10, 2018. The Joint Official  
16 Liquidators, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David Bennett  
17 of Grant Thornton Recovery and Reorganisation Ltd (the "JOLs," and together with CBG, the  
18 "Cayman Defendants"), dispute that they have been properly served with the Summons and  
19 Complaint, however, the JOLs have agreed to voluntarily accept service of the Summons and  
20 Complaint. The Cayman Defendants' time to respond to the Complaint is presently June 29, 2018.

21 2. The Cayman Defendants have requested a further extension in order to obtain  
22 approvals of the Grand Court of the Cayman Islands (the "Grand Court"), which approval is required  
23 to enable the Cayman Defendants to defend this proceeding and retain U.S. counsel. That approval  
24 process has been commenced but the Cayman Defendants have not yet received the approval of the  
25 Grand Court, but have received approval of the Liquidation Committee.

26 3. This is the undersigned parties' second request for an extension.  
27  
28

1 IT IS ORDERED THAT the Cayman Defendants shall have until August 31, 2018 to file a  
2 response to the Complaint.

3  
4 IT IS SO ORDERED:

5   
6 \_\_\_\_\_  
7 United States Magistrate Judge  
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9 DATED: August 16, 2018  
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